TETRA TECH

June 25, 2007

Tom McLaughlin, Project Manager
U.S. Nuclear Regulatory Commission
Division of Waste Management and Environmental Protection
Mailstop T-7E18
Washington DC 20555

RE: Highland Reclamation Project, Radioactive Materials License SUA-1139, Docket No. 40-8102, License Condition #22 Amendment

Dear Mr. McLaughlin:

After reviewing the current Radioactive Material License SUA-1139, we request that modifications be made to License Condition 22. License Condition 22 states that the calibrations of instruments used in radiological monitoring shall be performed and reported on a semiannual basis. The standard practice calibration frequency for the instruments currently being used for radiological monitoring, including free release activities, is annual. Therefore it is recommended that the license be modified such that both the calibration and reporting frequencies be changed to an annual basis. This matter was discussed with the NRC Region IV staff during the May 1, 2007 inspection and followed up with an exchange of calibration information.

License Condition 22 currently reads as follows:

> 22. Groundwater monitoring required by this license shall be conducted in accordance with the quality assurance program specified in Chapter 4 of ExxonMobil's Highland Mine Site Procedures Manual as updated. Notwithstanding the representations in the licensee's quality assurance program, calibrations of instruments used in radiological monitoring shall be performed on a semiannual basis or in accordance with manufacturer's recommendations, whichever is more frequent. The monitoring results shall be reported semiannually to the Chief, Fuel Cycle Facilities Branch, Division of Fuel Cycle Safety and Safeguards, Office of Nuclear Safety and Safeguards, U.S. Nuclear Regulatory Commission, Washington DC 20555, in accordance with the requirements of 10 CFR 40.65. Monitoring data shall be reported in the format shown in "Sample Format for Reporting Monitoring Data."

Our suggested language for License Conditions 22 would read as follows:

> 22. Groundwater monitoring required by this license shall be conducted in accordance with the quality assurance program specified in Chapter 4 of ExxonMobil's Highland Mine Site Procedures Manual as updated. Calibration of instruments used in radiological monitoring shall be performed on an annual basis. The monitoring results shall be reported annually to the Chief, Fuel Cycle Facilities Branch, Division of Fuel Cycle Safety and Safeguards, Office of Nuclear Safety and Safeguards, U.S. Nuclear Regulatory Commission, Washington DC 20555, in accordance with the requirements of 10 CFR 40.65.

Tetra Tech
3801 Automation Way, Suite 100, Fort Collins CO 80525
Tel 970.223.9600 Fax 970.223.7171 www.tetratech.com

If you have questions or need additional information, please call me at (970) 227-8578.

Sincerely,

Tetra Tech

Mahesh Vidyasagar for

H. Robert Meyer, Ph.D.
Senior Health Physicist

cc: Dan Burnham, ExxonMobil Corporation
Dave Roberson, de maximus inc
Rebecca Lindeman, Arcadis